

**EXHIBIT A**

## **[Proposed] Order Concerning the Applicability of Inverse Condemnation**

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18 **UNITED STATES BANKRUPTCY COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 **In re:**

22 **PG&E CORPORATION,**

23 **- and -**

24 **PACIFIC GAS AND ELECTRIC**  
25 **COMPANY,**

26 **Debtors.**

27  Affects PG&E Corporation  
 Affects Pacific Gas and Electric Company  
 Affects both Debtors

28 \*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).

1 Bankruptcy Case No.  
19-30088 (DM)

1 Chapter 11  
(Lead Case)  
(Jointly Administered)

1 [PROPOSED] ORDER CONCERNING  
1 THE APPLICABILITY OF INVERSE  
1 CONDEMNATION

1 On October 25, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric  
2 Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the  
3 “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), the Official  
4 Committee of Unsecured Creditors and certain PG&E Shareholders filed the Joint Brief of Debtors  
5 and the Official Committee of Unsecured Creditors and Supplemental Statement of the PG&E  
6 Shareholders Concerning the Applicability of Inverse Condemnation. After full consideration of all  
7 of the parties’ submissions on this issue, the Court’s record and file in this matter, and the arguments  
8 of counsel, and good cause appearing the Court finds and **IT IS HEREBY ORDERED THAT:**

9           1.     Inverse condemnation does not apply to investor-owned utilities such as PG&E under  
10 applicable California Supreme Court precedent;

11       2.     The application of inverse condemnation to investor-owned utilities such as PG&E  
12 would violate the Takings and Due Process Clauses of the U.S. Constitution.

**\*\* END OF ORDER \*\***